

# AUSTRALIAN PEAK NURSING and MIDWIFERY FORUM



**18 February 2009**

Ms Bronwyn Nardi  
Chair  
Practitioner Regulation Subcommittee  
of the Health Workforce Principal Committee  
Email: [NRAIP@dhs.vic.gov.au](mailto:NRAIP@dhs.vic.gov.au)

Dear Ms Nardi

*Re: Submission to further Consultation Paper - Proposed arrangements for specialists within the National Registration and Accreditation Scheme for the Health Professions.*

The Australian Peak Nursing and Midwifery Forum (APNMF) is a coalition of the peak nursing and midwifery organisations in Australia, which exists to work collaboratively on issues of national importance to nursing and midwifery. The APNMF identifies areas of common interest and concern relating to nursing and midwifery and attempts to work towards a position of consensus. The APNMF also takes joint action in areas of importance to nursing and midwifery and develops joint position statements which provide recommended policy directions for government and other relevant stakeholders.

The APNMF is comprised of the:

- Australian Nursing and Midwifery Council;
- Congress of Aboriginal and Torres Strait Islander Nurses;
- Royal College of Nursing, Australia;
- Council of Deans of Nursing and Midwifery;
- Australian College of Midwives;
- Australian Nursing Federation.

We refer to your paper of 21 January 2009 inviting comments on the *proposed arrangements for specialists within the National Registration and Accreditation Scheme for the Health Professions*.

The commitment of nursing and midwifery to national regulation is based on ensuring the protection of the public and on maintaining the highest standards of nursing and midwifery care to the Australian community through designing a system which supports health professionals. This includes a

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commitment to taking the time necessary to ensure that the scheme developed is best practice in terms of protection of the public and is implemented carefully, thoughtfully and transparently.

The APNMF has discussed the proposals in detail and provides the following comments. The Australian Nursing Federation (ANF) has as a result of recent discussions reached an alternative view with respect to a number of matters raised in this consultation paper. Subsequently the ANF has submitted an independent response to this consultation paper.

## **Registration arrangements consultation paper**

### **Proposal 7.1**

The proposed amendments are a significant improvement to the initial proposal, however the APNMF proposal is that the Nursing and Midwifery Board of Australia (NMBA) must have the power to determine what subtypes of 'limited' registration may be required for nursing and midwifery in the interest of public safety.

### **Proposal 9.2.1**

In line with international best practice the majority of the Australian Nursing and Midwifery Regulatory Authorities apply existing continuing competence assessment processes for annual renewal of registration. The implementation of national registration and accreditation provides the opportunity to develop a national system that builds upon current existing processes and is standardised, systematic and accessible for all nurses and midwives. The ANMC, in consultation with the professions, has developed a National Framework for Continuing Competence for implementation by the NMBA under the national scheme.

### **Proposal 9.2.2**

The APNMF agrees that the accreditation of individual education providers against the accreditation standards is part of the accreditation function. We reiterate our response to proposal 9.2.1 that the implementation of national registration and accreditation provides an opportunity for the national boards to implement a national system for the demonstration of continuing competence which best fits each individual profession.

### **Proposal 10.1.1**

The APNMF supports the proposal for the legislation to include provisions which allow the NMBA to recommend specialties and endorse specialist nurses and midwives providing;

- it is in the best interests of public safety;
- standards for the educational qualifications are developed in consultation with the professions and consumers and approved by the NMBA; and
- the appropriate educational qualifications that meet the NMBA standards have been completed by individual practitioners.

As previously stated in the APNMF submission on accreditation the APNMF strongly believes it is the role of the NMBA not the Ministerial Council to approve the accreditation standards for courses leading to registration, enrolment, authorisation and endorsement

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## Proposal 10.3.1

In line with best practice principles the APNMF believes that open and transparent consultation with key stakeholders such as registrants, professional and industrial organisations and in particular consumers; in the development of all professional and accreditation standards must be a feature of the scheme. However, it is not considered necessary to prescribe these practices in the legislation. This would be better dealt with through the development of best business processes.

## Proposal 12.1

The APNMF supported the initial proposal and also supports the proposed addition.

## Accreditation arrangements consultation paper

### Proposal 3.4.3

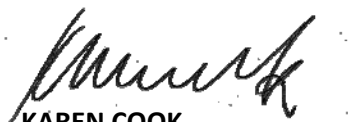
As stated in our previous submission the APNMF holds the view that the approval of new specialities and speciality areas of practice must be the responsibility of the national boards.

The APNMF supports the proposal for the national boards to determine how the current registration status of individual registrants should translate to the new scheme.

We reiterate our comments in relation to proposal 10.3.1 in the registration paper which support the necessity for consultation in the development of standards as an essential feature of good governance for inclusion in the business processes of the national boards not the legislation for the scheme.

Thank you in taking the time to read the APNMF submission in preparation for further discussions.

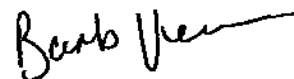
Yours sincerely



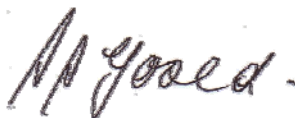
**KAREN COOK**  
Chief Executive Officer  
Australian Nursing and Midwifery Council



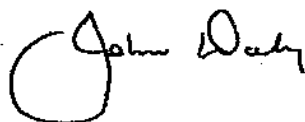
**DEBRA CERASA**  
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